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August 25, 2021

VIA ECF

Hon. Vernon S. Broderick
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Courtroom 518
New York, New York 10007

APPLICATION GRANTED
SO ORDERED 
VERNON S. BRODERICK
U.S.D.J. 8/26/2021

Re: *United States v. Moises Lluberres*, 20-cr-493 (VSB)

Dear Judge Broderick:

I write on behalf of defendant Moises Lluberres in the above-referenced matter to respectfully request the temporary modification of his conditions of pretrial release to permit him to travel to New York City on two separate occasions to prepare for and attend the *Monsanto* hearing scheduled for September 13, 2021: (1) from August 30, 2021 through September 1, 2021, and (2) from September 9, 2021 through September 14, 2021.

I have discussed this request with the government (AUSA Chiuchiolo) and Pretrial Services (Officer Rothman) who do not object to the proposed modification.¹

Respectfully Submitted,

MEISTER SEELIG & FEIN LLP

/s/ IH

Henry E. Mazurek
Ilana Haramati
Counsel for Defendant Moises Lluberres

cc: Counsel of Record (*via ECF*)

¹ Because of technological constraints, Pretrial Services noted that Mr. Lluberres' home detention condition would not be monitored during these travel periods. Pretrial nonetheless consents to this travel request.